

1 GLYNN & FINLEY, LLP
 ADAM FRIEDENBERG, Bar No. 205778
 2 MARTINA I. CUCULLU, Bar No. 262529
 One Walnut Creek Center
 3 100 Pringle Avenue, Suite 500
 Walnut Creek, CA 94596
 4 Telephone: (925) 210-2800
 Facsimile: (925) 945-1975
 5 E-mail: afriedenberg@glynnfinley.com

6
 Attorneys for Plaintiff
 7 ConocoPhillips Company

8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

11 CONOCOPHILLIPS COMPANY, a)
 Delaware corporation,)

12 Plaintiff,)

13 vs.)

14 MILESTONE PACIFIC PROPERTIES,)
 LLC, a California Limited Liability)
 15 Company, BPG PACIFIC, LLC, a)
 California Limited Liability Company,)
 16 COPELAND CREEK APARTMENTS,)
 LLC, a California Limited Liability)
 17 Company, SAEED GHAFOORI a/k/a)
 PAUL GHAFOORI, an individual, GISSOU)
 18 GHAFOORI, an individual, GLENN)
 LARSEN, an individual, and FIRST)
 19 AMERICAN TITLE INSURANCE)
 COMPANY, a California Corporation,)

20 Defendants.)
 21)

Case No. CV 10-00079 SBA

STIPULATION AND ~~PROPOSED~~
ORDER SCHEDULING DEBTORS'
EXAMINATIONS AND DEADLINE FOR
PRODUCTION OF DOCUMENTS

22
 23 On February 2, 2011, the Court found that good cause exists for permitting Plaintiff
 24 ConocoPhillips Company (“ConocoPhillips”) to take debtors’ examinations and serve requests
 25 for the production of documents that will aid in the execution of the judgment. Thus, the Court
 26 ordered that Defendants Saeed Ghafoori, a/k/a Paul Ghafoori, Gissou Ghafoori, Glenn Larsen
 27 (“Larsen”), Milestone Pacific Properties, LLC (“Milestone”), BPG Pacific, LLC (“BPG”), and
 28 Copeland Creek Apartments, LLC (“Copeland”) (collectively, “Defendants”) appear personally

1 on March 2, 2011, in this Court for such examinations. ConocoPhillips subsequently served all
2 Defendants with the examination order, as well as subpoenas requiring the production of certain
3 documents. The parties now stipulate, and request that the Court order, as follows:

4 1. All Defendants shall produce documents responsive to ConocoPhillips' document
5 requests and subpoenas no later than March 18, 2011;

6 2. Larsen and the person(s) most knowledgeable for Copeland shall appear for
7 examination at the United States District Court, 450 Golden Gate Avenue, San Francisco,
8 California, in Courtroom F, on ~~March 22, 2011~~ ^{March 23, 2011} at 9:30 a.m.;

9 3. Saeed Ghafoori, Gissou Ghafoori and the person(s) most knowledgeable for
10 Milestone and BPG shall appear for examination at the United States District Court, 450 Golden
11 Gate Avenue, San Francisco, California, in Courtroom F, on ~~March 24, 2011~~ ^{March 30, 2011} at 9:30 a.m.

12 Dated: March 10, 2011

13 GLYNN & FINLEY, LLP
14 ADAM FRIEDENBERG
15 MARTINA I. CUCULLU
16 One Walnut Creek Center
17 100 Pringle Avenue, Suite 500
18 Walnut Creek, CA 94596

17 By /s/ Adam Friedenberg
18 Attorneys for Plaintiff
ConocoPhillips Company

19 Dated: March 10, 2011

20 LAW OFFICES OF JOHN T. SCHREIBER
21 JOHN T. SCHREIBER
22 2000 Ridgewood Road
23 Alamo, CA 94507

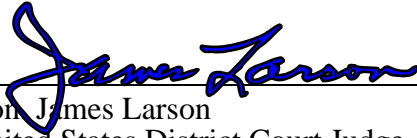
23 By /s/ John T. Schreiber
24 Attorney for Defendants

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORDER

Pursuant to the above stipulation, it is so ordered.

Dated: March 16, 2011



Hon. James Larson
United States District Court Judge